

1 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

2 IN AND FOR THE COUNTY OF COCHISE

3 STATE OF ARIZONA,) GRAND JURY NO. 19-00014 *WIAF*
4 Plaintiff,) CASE NO. CR2019- 00043
5 vs.)
6 DOUGLAS PACKER,)
7 Defendant.)
8

9 The Grand Jurors of the County of Cochise, in the name of the State of Arizona,
10 and by its authority accuse:

11 **DOUGLAS PACKER**

12 and charge that in Cochise County:

13 **COUNT 1**

14 On or about January 2, 2019, **DOUGLAS PACKER** committed sexual abuse by
15 intentionally or knowingly engaging in sexual contact with a person fifteen or more years
16 of age without consent, to wit: touched D.K.'s breast, in violation of A.R.S. §§13-1404,
13-1401, 13-105, 13-701, 13-702, and 13-801, a class 5 felony.

17 **COUNT 2**

18 On or about January 2, 2019, **DOUGLAS PACKER** committed sexual abuse by
19 intentionally or knowingly engaging in sexual contact with a person fifteen or more years
20 of age without consent, to wit: touched D.K.'s genitals, in violation of A.R.S. §§13-1404,
13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

21 **COUNT 3**

22 On or about January 2, 2019, **DOUGLAS PACKER** committed kidnapping by
23 knowingly restraining another person with intent to inflict death, injury or sexual offense
24 to victim, to wit: restrained D.K. to inflict sexual offenses on her, in violation of A.R.S.
25 §§13-1304, 13-1301, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 2 felony.

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COUNT 4

On or about January 2, 2019, **DOUGLAS PACKER** committed unlawful sexual conduct by, as an employee of the Cochise County Jail, intentionally or knowingly engaged in any act of a sexual nature with an offender who was in the custody of the Cochise County Jail, to wit: D.K., in violation of A.R.S. §§13-1419, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 5

On or about January 4, 2019, **DOUGLAS PACKER** committed sexual abuse by intentionally or knowingly engaging in sexual contact with a person fifteen or more years of age without consent, to wit: touched D.K.'s breast, in violation of A.R.S. §§13-1404, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 6

On or about January 4, 2019, **DOUGLAS PACKER** committed sexual abuse by intentionally or knowingly engaging in sexual contact with a person fifteen or more years of age without consent, to wit: touched D.K.'s genitals, in violation of A.R.S. §§13-1404, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 7

On or about January 4, 2019, **DOUGLAS PACKER** committed sexual assault by intentionally or knowingly engaging in oral sexual contact, without consent, to wit: D.K., in violation of A.R.S. §§13-1406, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 2 felony.

COUNT 8

On or about January 4, 2019, **DOUGLAS PACKER** committed unlawful sexual conduct by, as an employee of the Cochise County Jail, intentionally or knowingly engaged in any act of a sexual nature with an offender who was in the custody of the Cochise County Jail, to wit: D.K., in violation of A.R.S. §§13-1419, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 9

On or about January 4, 2019, **DOUGLAS PACKER** committed indecent exposure by exposing his genitals and another person is present and the defendant is reckless about whether the other person, as a reasonable person, would be offended or alarmed by the act, to wit: D.K., in violation of A.R.S. §§13-1402.A, 13-1401, 13-105, 13-707, 13-802, and 13-804.01, a class 1 misdemeanor.

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COUNT 10

On or about January 4, 2019, **DOUGLAS PACKER** committed indecent exposure by exposing his genitals and another person is present and the defendant is reckless about whether the other person, as a reasonable person, would be offended or alarmed by the act, to wit: E.D., in violation of A.R.S. §§13-1402.A, 13-1401, 13-105, 13-707, 13-802, and 13-804.01, a class 1 misdemeanor.

DATED this 10th day of January, 2019.

COCHISE COUNTY ATTORNEY

True Bill

BY:

LORI A. ZUCCO
Chief Criminal

EDWARD L. GOREE
Chief Criminal
Deputy County Attorney

Jamere Moore
Foreperson of the Grand Jury

Foreperson of the Grand Jury

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